



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

August 18, 2003

**Certified Mail No.: 7099 3220 0009 1976 2255**

Pam Nelson, Vice President  
Northwest Foam Products, Inc.  
2390 Rostron Circle  
Twin Falls, ID 83301

RE: AIRS Facility No. 083-00063, Northwest Foam Products, Inc., Twin Falls  
Final Tier II Operating Permit No. T2-030406

Dear Ms. Nelson:

The Department of Environmental Quality (Department) is renewing Northwest Foam Products, Inc.'s Tier II Operating Permit in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho*. Please note the permit number has changed from 083-00063 to T2-030406. No other term or condition in the permit has changed, and the effective date of Tier II Operating Permit No. T2-030406 is August 15, 2003.

The enclosed Tier II operating permit is based on the information contained in your permit application. The Department received no comments during the public comment period.

Steve VanZandt of the Twin Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Allred", is written over the word "Sincerely,".

C. Stephen Allred, Director  
Department of Environmental Quality

CSA/DH/sd

Permit No. T2-030406

Enclosure

cc: Steve VanZandt, Twin Falls Regional Office  
Sherry Davis, Technical Services  
Laurie Kral, EPA Region 10  
Dustin Holloway, Permit Writer  
Dan Salgado, Regional Permit Coordinator  
Joan Lechtenberg, Public Comment  
Phyllis Heitman (Ltr Only)  
Reading File (Ltr Only)



**Air Quality  
TIER II OPERATING PERMIT**  
**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** T2-030406

**AIRS FACILITY NO.:** 083-00063

**AQCR:** 63

**CLASS:** SM80

**SIC:** 3086

**ZONE:** 11

**UTM COORDINATE (km):** 710.5, 4713.2

**1. PERMITTEE**  
Northwest Foam Products, Inc.

**2. PROJECT**  
Tier II Operating Permit Renewal

<b>3. MAILING ADDRESS</b> 2390 Rostron Circle	<b>CITY</b> Twin Falls	<b>STATE</b> ID	<b>ZIP</b> 83301
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<b>4. FACILITY CONTACT</b> Pam Nelson	<b>TITLE</b> Vice President	<b>TELEPHONE</b> (208) 734-7426
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<b>5. RESPONSIBLE OFFICIAL</b> Pam Nelson	<b>TITLE</b> Vice President	<b>TELEPHONE</b> (208) 734-7426
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<b>6. EXACT PLANT LOCATION</b> Longitude 114° 26' 15" Latitude 42° 32' 20"	<b>COUNTY</b> Twin Falls
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**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Manufacture plastic foam products

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
C. STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** August 18, 2003

**DATE EXPIRES:** August 18, 2008

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## **Acronyms, Units, and Chemical Nomenclatures**

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
EPS	expanded polystyrene
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
NO <sub>x</sub>	nitrogen oxides
PM	particulate matter
SIC	Standard Industrial Classification
SM	synthetic minor
T/month	tons per month
T/yr	tons per consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030406**

<b>Permittee:</b>	Northwest Foam Products, Inc.	<b>AIRS Facility No.</b> 083-00063	<b>Date Issued:</b>	August 18, 2003
<b>Location:</b>	Twin Falls, Idaho		<b>Date Expires:</b>	August 18, 2008

**1. TIER II OPERATING PERMIT SCOPE****Purpose**

- 1.1 The purpose of this Tier II operating permit is to limit the facility's potential to emit below Tier I major source thresholds (IDAPA 58.01.01.008.10). The primary pollutant emitted by the facility is VOC's.
- 1.2 This Tier II permit incorporates the following permit:
- Tier II Operating Permit No. 083-00063, issued November 15, 1996

**Regulated Sources**

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
3	EPS Expansion	None

- 1.4 Table 1.2 identifies all other air pollution-emitting sources at the facility that do not require specific permit conditions to demonstrate compliance with applicable air quality standards.

**Table 1.2 OTHER AIR POLLUTION SOURCES**

<b>Source Description</b>	<b>Heat Input Capacity (MMBtu/hr)</b>	<b>Fuel Type</b>
Boiler	5.021	Natural gas

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**2. FACILITY-WIDE CONDITIONS*****Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
  - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
  - Paving of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

***Odors***

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

**Visible Emissions**

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

**Excess Emissions**

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**Open Burning**

- 2.10 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

**Air Stagnation Advisory Days**

- 2.11 The permittee shall comply with the *Air Pollution Emergency Rule* in accordance with IDAPA 58.01.01.550-562.

**Monitoring and Recordkeeping**

- 2.12 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the



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results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

***Obligation to Comply***

- 2.13 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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### 3. EPS EXPANSION

- 3.1 Northwest Foam Products, Inc. produces expanded polystyrene (EPS) bead products such as block foam insulation, packaging materials, and architectural materials. The processes utilized in the production of these foam products include bead pre-expansion, drying, prepuff aging, block molding, and product aging. The primary pollutant emitted from the process is VOC's. Table 3.1 summarizes the emissions units and control devices used in the EPS expansion process.

Table 3.1 EPS Expansion Process

Emissions Units	Emissions Control Device
Bead pre-expansion, drying, prepuff aging, block molding, aging, and final product aging	None

#### **Emissions Limits**

- 3.2 Monthly VOC emissions shall not exceed 13 T/month.
- 3.2.1 Annual VOC emissions shall not exceed 90 tons per any consecutive 12-month period (T/yr).

#### **Operating Requirements**

- 3.3 The VOC content of EPS bead used in the process shall not exceed 15.3 T/month. Total VOC content of EPS used in the process shall not exceed 105.9 T/yr.

#### **Monitoring and Recordkeeping Requirements**

- 3.4 The permittee shall record the following for each type of EPS bead used during each shift:
- The total pounds of EPS beads used.
  - The percent VOC content by weight given in the Certificate of Analysis for the EPS beads used.
  - The calculated pounds of VOC contained in the mass of EPS used using the following equation:

$$VOC_{each} = M_{EPS} * \%VOC_{EPS}, \text{ where}$$

$$VOC_{each} = \text{pounds of VOC contained in the mass of EPS used;}$$

$$M_{EPS} = \text{pounds of EPS used;}$$

$$\%VOC_{EPS} = \text{percent VOC content by weight given in the Certificate of Analysis for the EPS beads used}$$

- 3.5 The permittee shall calculate the total pounds of VOC contained in the mass of all types of EPS used for each day using the following equation:

$$\sum (VOC_{each}) = VOC_{each} + VOC_{each}, \text{ where;}$$

$$\sum (VOC_{each}) = \text{total pounds of VOC contained in the pounds of EPS used for each shift}$$

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- 3.6 Each month the permittee shall calculate and record the total tons of VOC contained in the mass of EPS used.
- 3.7 The permittee shall calculate and record the total tons of VOCs contained in the total pounds of EPS used over the last 12-month period using the monthly totals calculated in Permit Condition 3.6.

***Reporting Requirements***

- 3.8 Each month the permittee shall record the information required in Sections 3.4, 3.5, and 3.6 of this permit. A compilation of the most recent five years of records shall be maintained on-site and made available to Department representatives upon request.

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**4. SUMMARY OF EMISSION RATE LIMITS**

Table 4.1 provides a summary of all emission rate limits required by this permit.

**Table 4.1 SUMMARY OF EMISSION RATE LIMITS**

Northwest Foam Products, Inc. Twin Falls Emission Limits <sup>a</sup> – (T/month), and Annual <sup>b</sup> (T/yr)		
Source Description	VOC	
	T/month	T/yr
EPS Expansion	13	90

<sup>a</sup> As requested by the permittee.

<sup>b</sup> As requested by the permittee. The permittee applied for a Tier II operating permit in order to maintain synthetic minor status and avoid major source permitting.

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**5. FACILITY-WIDE PERMITTED EMISSIONS**

Table 5.1 provides a summary of the permitted emissions of the facility based on potential to emit. The emissions inventory table is provided for informational purposes only.

**Table 5.1 SUMMARY OF PERMITTED EMISSIONS**

Northwest Foam Products, Inc., Twin Falls Potential Emissions* -Monthly (T/month), and Annual (T/yr)										
Source Description	PM <sub>10</sub>		NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>	
	T/month	T/yr	T/month	T/yr	T/month	T/yr	T/month	T/yr	T/month	T/yr
EPS Expansion	--	--	--	--	--	--	13	90	--	--

\* As determined by a pollutant-specific EPA reference method, Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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**6. TIER II PERMIT GENERAL PROVISIONS**

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.